



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

June 22, 1989

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

Ms. Judith Spray  
Pollulert Systems  
Emhart Electrical/Electronic Group  
P.O. Box 706  
Indianapolis, IN 46206-0706

Dear Ms. Spray:

This is in response to your letter requesting a clarification of the Federal regulations relating to leak detection for pressurized piping at underground storage tanks. You asked if annual line testing is required if system has a permanent line monitoring device.

There are two basic ways for an owner of a tank with pressurized lines to meet the requirements of 280.41(b)(1)(ii):

1. Have an annual line tightness test that meets the standards of 280.44(b) and combine them with an automatic line leak detector capable of shutting-off or restricting flow if a leak is detected of 3 gallons per hour at 10 pounds per square inch line pressure within one hour. However, if an automatic line monitoring device meets the performance standard for a line tightness test, that it "can detect a 0.1 gallon per hour leak rate at one and one-half times operating pressure," then it can be used to substitute for the annual line tightness test.
2. Vapor, groundwater, or interstitial monitoring may be also performed monthly in accordance with the standards in 280.43(e), (f), and (g) as a substitute for the annual line test.

Therefore, the answer to your question is that permanently installed pressure, vapor, groundwater or interstitial monitors may be used in place of annual line tightness tests as long as these methods meet the applicable performance standards. In all cases, automatic line leak detection capability must be provided with pressurized lines.

I hope this has answered your question regarding the regulation. If I may be of further assistance please the contact me.

Sincerely,

/s/

Thomas Young  
Standards Branch  
Office of Underground Storage Tanks